

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE, WESTERN DIVISION

Case No. 1:19-cr-10040-Fowlkes

UNITED STATES OF AMERICA,

vs.

JEFFREY YOUNG,
ALEXANDER ALPEROVICH,
ANDREW RUDIN,
Defendants.

**UNITED STATES' MOTION TO SEAL THE GOVERNMENT'S REPLY TO
DEFENDANT YOUNG'S RESPONSE IN OPPOSITION TO THE FILTER TEAM'S
MOTION FOR AUTHORIZATION TO PRODUCE DISCOVERY AND RESPOSE TO
DEFENDANTS ALPEROVICH AND RUDIN'S MOTION FOR AUTHORIZATION TO
PRODUCE DISCOVERY**

The United States, by and through the assigned Filter Team, respectfully requests that the court enter an order sealing the government's reply to Defendant Young's response in opposition to the Filter Team's motion for authorization to produce discovery and response to Defendant Alperovich and Rudin's motion for authorization to produce discovery until further order of the Court. The associated motion discusses potentially privileged communications. Accordingly, the motion to seal is necessary to protect the confidentiality of the potentially privileged information.

The assigned Prosecution Team shall not be delivered a copy of these pleadings pursuant to the Court's order regulating the production of discovery material to the defendant and third-parties issued on October 15, 2020. (Doc. 182, §2).

Dated: February 16, 2021

Respectfully submitted,

DANIEL KAHN, ACTING CHIEF
CRIMINAL DIVISION, FRAUD SECTION
U.S. DEPARTMENT OF JUSTICE

By: /s/ Bennett P. Starnes

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 16, 2021, I filed the foregoing document with the Clerk of the Court.

By: /s/ Bennett P. Starnes
Bennett P. Starnes

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